

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

V.

WAYFARER STUDIOS LLC, JUSTIN BALDONI,  
JAMEY HEATH, STEVE SAROWITZ, IT ENDS  
WITH US MOVIE LLC, MELISSA NATHAN, THE  
AGENCY GROUP PR LLC, and JENNIFER ABEL,

Defendants.

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**DECLARATION OF ELLYN S. GAROFALO IN SUPPORT OF THE WAYFARER  
PARTIES' LETTER MOTION TO QUASH BLAKE LIVELY'S DOCUMENT  
SUBPOENA TO HARCO INSURANCE COMPANY**

I, Ellyn S. Garofalo, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm Liner Freedman Taitelman + Cooley, LLP, attorneys of record for Wayfarer Studios LLC, It Ends With Us Movie LLC, Justin Baldoni, Jamey Heath, and Steve Sarowitz (the "Wayfarer Parties").

2. Attached hereto as Exhibit A is a true and correct copy of a subpoena Plaintiff Blake Lively served on Harco Insurance Company (the "Harco Subpoena").

3. Attached hereto as Exhibit B is a true and correct copy of Lively's First Set of Requests for Production to Wayfarer Studios LLC. Request 29 seeks "All applicable insurance agreements under which any insurer may be liable to satisfy all or any part of any judgment which may be entered in this action or to indemnify or reimburse payments made to satisfy all or part of any judgment." The Wayfarer Parties produced the applicable insurance policies, including the policy issued by Harco Insurance Company.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 13, 2025  
Los Angeles, CA

By: /s/ Ellyn S. Garofalo  
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